

CHARGE OF DISCRIMINATION

This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.

Charge Presented To: Agency(ies) Charge No(s):

 FEPA

494-2020-00747

 EEOC

Tennessee Human Rights Commission

and EEOC

State or local Agency, if any

Name (indicate Mr., Ms., Mrs.)

Ms. Dorothy Frame

Home Phone (Incl. Area Code)

Date of Birth

Street Address

City, State and ZIP Code

Clarksville, TN 37042

Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)

Name Laborers Local Union 576	No. Employees, Members 1,316	Phone No. (Include Area Code) (502) 375-0581
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Street Address 646 Phillips Lane	City, State and ZIP Code Louisville, KY 40209
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Name Laborers' International Union of North America	No. Employees, Members 561,233	Phone No. (Include Area Code) (202) 737-8320
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Street Address 905 16th Street	City, State and ZIP Code Washington, DC 20006
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DISCRIMINATION BASED ON (Check appropriate box(es).)	DATE(S) DISCRIMINATION TOOK PLACE Earliest Latest July 25, 2019 Continuing
<input type="checkbox"/> RACE <input type="checkbox"/> COLOR <input type="checkbox"/> SEX <input checked="" type="checkbox"/> RELIGION <input type="checkbox"/> NATIONAL ORIGIN <input type="checkbox"/> RETALIATION <input type="checkbox"/> AGE <input type="checkbox"/> DISABILITY <input type="checkbox"/> GENETIC INFORMATION <input type="checkbox"/> OTHER (Specify)	<input checked="" type="checkbox"/> CONTINUING ACTION

THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)):

1. Ms. Frame is employed by J & J Worldwide Service who has a contract with the Laborers Local Union 576 (the Union), and the contract requires Ms. Frame to join or financially support the Union as a condition of employment. Ms. Frame works at Ft. Campbell on a federal enclave in Tennessee.
2. Ms. Frame has sincere religious beliefs that bar her from joining or financially supporting the Union. Ms. Frame is a Catholic, and she believes that she should not support a labor union that supports abortion, because abortion involves the unjustified destruction of human life. Funding or supporting abortion is therefore sinful for Ms. Frame. Her sincere religious beliefs are based on her understanding of Catholic teaching, scripture, and God's will.
3. Ms. Frame believes that the Union funds and supports abortion, and so it would be sinful to join or financially support the Union.
4. On July 25, 2019, Ms. Frame sent the Union a letter requesting a religious accommodation of her objection to joining or financially supporting the Union.
5. Although Ms. Frame had been a member of the Union for four years when she asked for an accommodation, Ms. Frame had only been a Catholic for the last two years of her membership. In addition, she only learned that the Union promoted abortion shortly before she wrote her accommodation request. After learning that the Union promoted abortion in violation of her sincere religious beliefs, Ms. Frame attempted to discontinue her support by requesting an accommodation.
6. In August 2019, the Union responded by challenging her religious beliefs and asking her to further prove her religious beliefs. The Union lawyer stated that he did not understand her objection, given his education and understanding of the Catholic faith. The Union required Ms. Frame to provide a theological defense to meet its "standard for a 'legitimate justification.'"

(continued)

7. Despite the fact that Ms. Frame sent the Union a letter from Father Richard D. Childress, III in support of her religious objection, the Union lawyer rejected this evidence based on his supposedly superior religious views.
8. On September 4, 2019, Bruce N. Cameron responded on behalf of Ms. Frame to the Union lawyer and provided further proof of her religious objection and further proof of the teachings of the Catholic Church.
9. The Union never responded to this further proof, has not accommodated Ms. Frame, and instead continued to have dues deducted from her salary in violation of her religious beliefs.
10. By these acts, the Union has violated Ms. Frame's rights under Title VII of the Civil Rights Act of 1964, as amended, and parallel state laws.

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

NOTARY – When necessary for State and Local Agency Requirements

I declare under penalty of perjury that the above is true and correct.

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

SIGNATURE OF COMPLAINANT

12-21-2019 Dorothy Frame
Date Charging Party Signature

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE
(month, day, year)

RECEIVED

DEC 26 2019

U.S. EEOC
Nashville Area Office
Nashville, TN